

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

JAMES GRAHAM, as Special
Administrator for the Estate of Anthony
Huff, Deceased

Plaintiff,

V.

Case No.: CIV-17-634-M

GARFIELD COUNTY CRIMINAL
JUSTICE AUTHORITY, an Oklahoma
Title 60 authority; BOARD OF
COUNTY COMMISSIONERS
OF THE COUNTY OF GARFIELD, a
Political Subdivision of the State of
Oklahoma, et. al

Defendants.

**DEFENDANT JENNIFER NILES’S UNOPPOSED MOTION
FOR ENTRY OF AMENDED PROTECTIVE ORDER**

COMES NOW Defendant Jennifer Niles, by and through her counsel of record, and requests this Court enter an Agreed Amended Protective Order in light of this Court's Order [Doc. 95] on Defendants' Joint Motion to Renew Stay. Defendant Niles states as follows:

1. The parties have engaged and continue to engage in written discovery subject to the previously entered Agreed Protective Order [Doc. 73]. Given the Court's ruling with respect to a Stay [Doc. 95], depositions are expected to be taken in the near future. The Court's Order sets out certain terms of discovery to proceed at this time. Hence, the

parties desire to amend the Protective Order to reflect the Court's Order relative to the limited Stay.

2. All parties have agreed on the terms an Agreed Amended Protective Order, which comports with the terms of the Court's Order relative to its granting, in part, a limited Stay and imposing protective measures as to depositions which are taken during the period of the limited Stay.

3. Defendant Niles requests that the Court approve and enter the Agreed Amended Protective Order, and there is no opposition from any party.

4. The proposed Agreed Amended Protective Order will be emailed to the Court and all counsel as customary.

WHEREFORE, Defendant Jennifer Niles requests that the Court approve this Unopposed Application for Entry of Amended Protective Order.

Respectfully submitted,

s/Carson C. Smith

Robert S. Lafferrandre, OBA No. 11897

Randall J. Wood, OBA No. 10531

Carson C. Smith, OBA No. 22303

Pierce Couch Hendrickson

Baysinger & Green, L.L.P.

1109 N. Francis

Oklahoma City, Oklahoma 73106

Telephone: (405) 235-1611

Facsimile: (405) 235-2904

rlafferrandre@piercecouch.com

rwood@piercecouch.com

csmith@piercecouch.com

Attorneys for Defendant Jennifer Niles

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of September 2018, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

David B. Donchin dlb@dlb.net
Hilary S. Allen dlb@dlb.net
DURBIN, LARIMORE & BIALICK

Clint Claypole clint@lcb.law
Randy J. Long randy@lcb.law
Reagan D. Allen reagan@lcb.law
LONG, CLAYPOLE & BLAKLEY LAW, PLC.

Edward J. Wyant eddie@wyantlawfirm.com
WYATT LAW FIRM
Attorneys for Plaintiff

Chris J. Collins cjc@czwlaw.com
Jordan L. Miller jlm@czwlaw.com
COLLINS, ZORN, WAGNER, P.C.
*Attorneys for Defendants Garfield County
Criminal Justice Authority; Board of County Commissioners
of Garfield County and Jerry Niles, in his Official Capacity*

Alexander C. Vosler avosler@johnsonhanan.com
Sean P. Snider ssnider@johnsonhanan.com
Alexandra G. Ahloy aahloy@johnsonhanan.com
JOHNSON HANAN & VOSLER
*Attorneys for Defendants
Turn Key Health Clinics and Lela Goatley*

James L. Gibbs, II jgibbs@gphglaw.com
GOOLSBY, PROCTOR, HEEFNER & GIBBS, P.C.
*Attorney for Defendant Jerry Niles in his
Individual Capacity*

s/ Carson C. Smith

Carson C. Smith